

1 PHILLIP A. TALBERT
United States Attorney
2 KEVIN C. KHASIGIAN
Assistant U. S. Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700

5 Attorneys for the United States
6
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$269,565.50 SEIZED FROM
FIRST RELIANCE BANCSHARES, INC.
15 ACCOUNT NUMBER 5220000969, HELD IN THE
NAME OF LIFESTYLE DEVELOPMENT, LLC,
16

17 APPROXIMATELY \$1,373.95 SEIZED FROM
VALLEY NATIONAL BANK ACCOUNT
NUMBER 8843534202, HELD IN THE NAME OF
18 LIFESTYLE DEVELOPMENT, LLC,

19 APPROXIMATELY \$7,982.56 SEIZED FROM
FIRST RELIANCE BANCSHARES, INC.
20 ACCOUNT NUMBER 5210000745, HELD IN THE
NAME OF THOMAS EIDE,
21

22 APPROXIMATELY \$50,000.00 SEIZED FROM
MAINSTREET BANK ACCOUNT NUMBER
2010039009, HELD IN THE NAME OF PRV
23 INTERNATIONAL, LLC,

24 APPROXIMATELY \$36,650.38 SEIZED FROM
BANK OF AMERICA, N.A. ACCOUNT NUMBER
25 383019458700, HELD IN THE NAME OF
VITAKEM NUTRA, AND
26
27
28

STIPULATION AND ORDER EXTENDING
TIME FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

1 APPROXIMATELY \$37,886.31 SEIZED FROM
2 SOUTHSTATE BANK, NA ACCOUNT NUMBER
3 8010002012630, HELD IN THE NAME OF
4 SARAH NICK,

5
6 Defendants.

7 It is hereby stipulated by and between the United States of America and potential claimants
8 Thomas Eide on behalf of himself and Lifestyle Development, LLC, PRV International, LLC, and
9 Vitakem Nutra, by and through their respective counsel, and Sarah Nick, on behalf of herself, appearing
10 *in propria persona* (“claimants”), as follows:

11 1. On or about May 7, 2024, the U.S. Postal Inspection Service (“USPIS”) seized the above-
12 referenced defendant funds pursuant to Federal seizure warrants (hereafter collectively “defendant
13 funds”).

14 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to
15 send notice to potential claimants, file a complaint for forfeiture against the defendant funds, or obtain an
16 indictment alleging that the defendant funds are subject to forfeiture within one hundred and fifty days of
17 seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That
18 deadline is October 4, 2024.

19 3. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
20 January 2, 2025, the time in which the United States is required to file a civil complaint for forfeiture
21 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
22 forfeiture.

23 4. Accordingly, the parties agree that the deadline by which the United States shall be
24 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment

25 ///

26 ///

27 ///

28 ///

alleging that the defendant funds are subject to forfeiture shall be extended to January 2, 2025.

Dated: 10/3/2024

PHILLIP A. TALBERT
United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

Dated: 9/30/2024

/s/ Daniel Olmos
DANIEL OLMOS
Attorney for potential claimant
Thomas Eide on behalf of himself and Lifestyle
Development, LLC
600 University Avenue
Palo Alto, CA 94301
(Signature authorized by email)

Dated: 10/1/2024

/s/ Oliver M. Krischik
OLIVER M. KRISCHIK
Attorney for potential claimant
PRV International, LLC
1055 Thomas Jefferson Street NW, Suite 620
Washington, DC 20007
(Signature authorized by email)

Dated: 10/3/2024

/s/ Daniel Conti
DANIEL CONTI
Attorney for potential claimant
Vitakem Nutra
626 Rexcorp Plaza
Uniondale, NY, 11556
(Signature authorized by email)

Dated: 10/3/2024

/s/ Sarah Nick
SARAH NICK
Potential claimant
Appearing in propria persona
2027 Brick Kiln Parkway
Mount Pleasant, SC 29466
(Signature authorized by email)

IT IS SO ORDERED.

Dated: _____

United States District Judge